

EXHIBIT G

Justina K. Sessions

From: Justina K. Sessions
Sent: Monday, September 12, 2016 7:31 PM
To: 'Ronnie Spiegel'
Subject: RE: Auto Parts - Subpoena to Honda

Ronnie,

As I mentioned before, September is not going to work for Honda because both I and Honda's in-house counsel have long-planned vacations. We can ask about dates for early October but it's very hard to schedule and prepare without knowing whether you are going to accept our offer of production in whole or in part. We made our first offer on June 22 and added to that offer on August 30, but we have not received any response or counter-offer from the serving parties. Honda has already produced a significant volume of parts-purchase data and maker layout evaluation forms (which compare suppliers and bids) for wire harnesses, electronic control units, heater control panels, instrument panel clusters, fuse boxes, relay boxes, junction blocks, power distributors, wiring connectors and terminals, lead wire assemblies, cable bond, anti-lock brake skid sensors and wires, switches, occupant detection sensors, cable reels, oil pressure switches and sensors, fuel senders and gauges, switches, steering angle sensors, seat belts, spark plugs, radiators, AVR parts, windshield wipers/washers, and bearings. In addition to the documents already produced to DOJ, and Honda's prior production of MSRP, dealer-invoice, holdback, etc. data, Honda has offered to produce:

- "cost by ship" data that purchasing provides to accounting and manufacturing prior to mass production. This data includes the total anticipated outsource cost for a new vehicle/major model change.
- data on the prior-to-mass-production price (and supplier) of every single component in a vehicle for every major model change for North American manufactured vehicles for the past 10 years (and farther back if that information is readily accessible).
- summary operations and procedure documents governing Honda's use of maker layout evaluation forms (including the criteria on which bids and suppliers are evaluated)
- quarterly quotations that manufacturing provides to American Honda Motor Co, Inc. back to 1998 (which is the earliest date that we have data in the database)
- data that the dealers give to Honda regarding the terms of new vehicle sales, provided the dealers consent to Honda's production of that information
- summary of all incentive programs for which Honda has been able to locate information

As the current deposition topics cover at least three different witnesses who are in two different locations, it would be very helpful to get an idea of whether there are any topics that we can eliminate – and I expect there are some. For example, it's hard for me to explain to Honda that we need to go through the time and expense of preparing and presenting a witness on data from the dealers to end consumers when it's not clear that we have any dispute about what information Honda has or is willing to produce (subject to the dealers' agreement). Similarly, we have offered to produce what we have on the prices that the manufacturing plants charge to American Honda (including fluctuations in that price due to things like labor expenses), so it's not clear to me what need you have for a deposition on that issue.

Regards,
Justina

From: Ronnie Spiegel [mailto:ronnie@hbsslaw.com]
Sent: Monday, September 12, 2016 2:39 PM
To: Justina K. Sessions
Subject: RE: Auto Parts - Subpoena to Honda

Justina,

Is there a date that we can set for the 30(b)(6) in the event we do not reach agreement? We are very much hoping to have the depositions completed by end-September. Are there any dates in September that will work for the Honda witnesses. If not, is there a date we can put on calendar for the first week in October? I will call you later in the week to discuss the status of our response, but for now, I am hoping to at least find a date.

Thanks,
Ronnie

Ronnie Spiegel | Hagens Berman Sobol Shapiro LLP | Direct: (206) 268-9343

From: Justina K. Sessions [mailto:JSessions@kvn.com]
Sent: Tuesday, August 30, 2016 8:07 AM
To: Ronnie Spiegel; Jeniphr Breckenridge
Subject: Auto Parts - Subpoena to Honda

Ronnie and Jeniphr,
Please forward this as appropriate.

Counsel,
Further to our discussions regarding the Serving Parties' motion to compel and Honda's offer of a compromise regarding document and data production, I have additional information in response to your questions.

Parts purchasing information

As you will recall, Honda offered to produce the "cost by ship" data that purchasing provides to accounting and manufacturing prior to mass production. This data includes the total anticipated outsource cost for a new vehicle/major model change. Manufacturing and accounting do not receive a more-detailed breakdown of parts costs as part of the price-setting process. Nonetheless, you asked for the "backup" to this cost by ship, which would include the prior-to-mass-production price of all individual parts. As a compromise, Honda is willing to produce this backup data for every major model change for North American-manufactured vehicles for the past 10 years (and farther back if that information is readily accessible). As this part-by-part cost data includes supplier information, it will obviate the need for any separate document or data production regarding (i) a list of Honda's suppliers; and (ii) information about which suppliers were awarded the business for particular models. We propose limiting our production to major model changes because Honda very rarely changes suppliers between major model changes. This information coupled with the substantial productions from Honda's suppliers should enable you to determine whether there are any "holes" in the bid and purchase data that you already have. As I have previously told you, Honda is willing to work with the serving parties regarding additional RFQ and bid data, but a blanket request for all RFQs and bids for all parts is extremely burdensome, duplicative, and unnecessary – especially in light of Honda's already-substantial production of MLEF information (see below).

You also asked whether Honda has contracts with its parts suppliers. Honda has a standard contract that it uses with its suppliers. The contract is not specific to parts or models, but is a master agreement covering all parts. I assume that these contracts were requested as part of document requests to Honda's suppliers.

You asked about maker layout evaluation forms (MLEFs). As you will see from reviewing Honda's document production to date, you already have a substantial production of MLEFs relating to: wire harnesses, electronic control units, heater control panels, instrument panel clusters, fuse boxes, relay boxes, junction blocks, power distributors, wiring connectors and terminals, lead wire assemblies, cable bond, anti-lock brake skid sensors and wires, switches, occupant detection sensors, cable reels, oil pressure switches and sensors, fuel senders and gauges, switches, steering angle sensors, seat belts, spark plugs, radiators, AVR parts, windshield wipers/washers, and bearings. We believe this substantial production is more than sufficient. As a further offer of compromise, however, Honda is willing to produce the operations and procedure documents governing Honda's use of MLEFs. These documents provide an explanation of (i) when MLEFs are used; (ii) how they are completed; and (iii) how MLEF scores are computed and used.

Finally, you asked about something called a “lined business framework.” Honda does not use any tool or software by this name.

Manufacturing/cost-setting information

As you recall, Honda offered to produce the quarterly quotations that Honda manufacturing provides to American Honda Motor Co., Inc. Honda remains willing to produce the quarterly quotation amounts for US-manufactured models back to 1998, which is the earliest date that we have data in the current database.

You also asked whether Honda would be willing to produce copies of every single pricing announcement and/or dealer announcement regarding changes to holdback, etc. Honda believes this request is unreasonably burdensome given that Honda has already produced complete data regarding MSRP, dealer invoice price, fuel allowance, and holdback from 2000 to the present. We also inquired with Honda regarding the time it would take to locate every single dealer communication as you request. Honda employees estimate that this would take at least one week of uninterrupted work, as the letters you request are not kept in any single central location.

Deposition dates and locations

You asked about September 28-29. Honda’s inside and outside counsel have vacations scheduled for that time, so it will not work. We can look into dates in October. Also, depositions regarding price-setting, manufacturing data, and any “downstream” data will take place in Torrance, CA. Depending on the timing, a deposition regarding purchasing will take place in Ohio or Torrance.

Regards,
Justina

Justina K. Sessions
Attorney at Law

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